

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

AMERICAN ACCESSORIES  
INTERNATIONAL, LLC,

Plaintiff,

v.

CONOPCO, INC. d/b/a UNILEVER and  
UNILEVER UNITED STATES, INC.

Defendants.

(TAV)(HBG)

Case No.: 15-cv-00049

Varlan/Guyton

**MOTION TO DISMISS**

Come your Defendants, Conopco, Inc. d/b/a Unilever and Unilever United States, Inc. (collectively “Unilever”), by and through undersigned counsel, and move this Court for entry of an order dismissing Plaintiff American Accessories International, LLC’s Amended Complaint against Unilever in its entirety. As further and specifically set out in the Memorandum of Law filed contemporaneously herewith, each cause of action alleged in Plaintiff’s Amended Complaint – Count I (Breach of Contract), Count II (Promissory Estoppel), Count III (Promissory Fraud), Count IV (Negligent Misrepresentation) and Count V (Fraudulent Concealment) – fails to state a claim upon which relief can be granted and should be dismissed.

In support of this Motion, Unilever contemporaneously files its Memorandum of Law in Support of Defendants’ Motion to Dismiss Amended Complaint. Unilever respectfully requests an oral argument on this motion.

Respectfully submitted this 9<sup>th</sup> day of April, 2015

**KRAMER RAYSON LLP**

s/William J. Carver

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Attorneys for Defendant

Conopco, Inc. d/b/a Unilever

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Memorandum of Law has been filed via the Court's electronic filing system and that a copy of this filing has been sent via the Court's electronic filing system to counsel of record.

s/William J. Carver  
William J. Carver